

NOTICE OF CLAIM

To: Office of the New Jersey Attorney General
Division of Law
R.J. Hughes Justice Complex
P.O. Box 080
Trenton, NJ 08625

Office of the Middlesex County Counsel
County Administration Building
Second Floor
75 Bayard Street
New Brunswick, NJ 09801

Office of the Middlesex County Prosecutor
Public Safety Building, 3rd Floor
25 Kilpatrick Street
New Brunswick, NJ 09801

Perth Amboy Police Department
365 New Brunswick Avenue
Perth Amboy, NJ 08861

PLEASE TAKE NOTICE that the undersigned claimant hereby makes claim and demand

against you as follows:

1. *The claimant in this action is:*

Christopher Curtis Bellinger
559 Hazel Avenue
Perth Amboy, New Jersey

2. *Claimant's attorneys are:*

Karen A. Newirth
Newirth Law PLLC
43 West 43rd Street, Suite 160
New York, New York 10036
917-426-5551
karen@newirth-law.com

Irving Cohen
80 Broad Street, Suite 1900
New York, New York 10004
(212) 964-2544
icohenlaw@msn.com

**All notices should be sent to Karen A. Newirth, Esq., as counsel to Claimant,
at the address above.**

3. *The time when, the place where, and the manner in which the claim arose:*

Commencing on and after September 8, 2023 at Harned Street and Pfeiffer Blvd. and elsewhere in Perth Amboy, New Jersey, and continuing to the present, Claimant Christopher Bellinger was subject to an unlawful traffic stop, taken into custody, investigated, interrogated, and subjected to illegal searches of his person, automobile, and illegal entry into his home. Claimant was wrongfully identified, charged, arrested, detained, and maliciously prosecuted as a result of improper and unlawful actions by the Perth Amboy Police Department ("PAPD") and the Office of the Middlesex County Prosecutor ("OMCP") as the perpetrator of certain drug- and gun-related crimes he did not commit and which, in fact, never occurred. Members of the PAPD and the OMCP engaged in constitutional violations and unlawful conduct by causing Claimant to be stopped, detained, searched, and arrested without any legal basis, by falsely claiming to have a search warrant in order to illegally gain access to his home, creating false evidence and testimony against Claimant, and by suppressing and concealing exculpatory and favorable evidence to justify and support their false arrest, false imprisonment, and malicious prosecution of Claimant. Claimant's claims accrued upon the dismissal of the criminal case against him on February 1, 2024.

3. *The items of damages, injuries, and losses claimed here are:*

The items of injury and damages suffered by the Claimant include, *inter alia*, the following: emotional distress and mental anguish, physical injury and pain and suffering, deprivation of liberty, interference with intimate relationships, embarrassment, humiliation, shame, indignity, degradation, loss of quality of life, loss of employment opportunities and related income, loss of real property and expenses, damage to credit rating and loss of financial opportunity, and legal fees and expenses, due to being falsely and wrongfully arrested, charged, maliciously prosecuted, and the related deprivations of federal and state constitutional, statutory and common law rights.

4. *The names of the public entities and employees causing the injuries, damages and losses:*

The public entities causing the injuries, damages, and losses are: the Middlesex County Prosecutor's Office and the Perth Amboy Police Department.

The employees causing the injuries, damages, and losses include, but are not limited to:

Ciccone, Yolanda
Miller, Paul J.

Cattano, Larry
Reilly, Michael

Lopez, Anny
Batista, Benjamin J
Valera, Marcos
Guzman, David
Savoia, Kevin
Reyes, Yanelba
Almanzar, Luis

DeJesus, Jessica
Jimenez, Carmelo
Marcinko, John F
Joy, Christopher
Almanzar, Luis
Inzarry, Jessica


5. *The estimated amount of damages as of today's date:*

The estimated amount of damages is \$5 million, which is reached by calculating loss of employment opportunities and related income, loss of real property and expenses, damage to credit rating and loss of financial opportunity, legal fees and expenses, together with damages to compensate Claimant for emotional distress and mental anguish, physical injury and pain and suffering, deprivation of liberty, interference with intimate relationships, embarrassment, humiliation, shame, indignity, degradation, loss of quality of life.

PLEASE TAKE FURTHER NOTICE that the undersigned claimant presents this claim for adjustment and payment. You are hereby notified that unless it is adjusted and paid within the time provided by law from the date of presentation to you, the claimant intends to commence an action on this claim.

Dated: Perth Amboy, New Jersey

April 11, 2024


Christopher Belinger

By:

NEWIRTH LAW P.L.L.C.
43 West 43rd Street, Suite 160
New York, NY 10036
(917) 426-5551


Karen Newirth

Irving Cohen, Esq.
80 Broad Street, Suite 1900
New York, New York 10004
(212) 964-2544

/s/ Irving Cohen
Irving Cohen

Attorneys for Claimant

Local Counsel:

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Attorney at Law
709 Devon Street
Kearny, New Jersey 07032
NJ Bar No. 021192003